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VIA CM/ECF AND E-MAIL

November 21, 2024

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse 601 Market Street
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al. v. Babel Street, Inc.*, No. 1:24-cv-10596;
Joinder in Defendants' Consolidated Motion to Dismiss Plaintiffs'
Complaint**

Dear Judge Bartle:

This firm represents the Defendant Babel Street, Inc. ("Defendant") in the above-referenced matter. We write to advise the Court that Defendant requests to join the Consolidated Motion to Dismiss and the papers submitted in support thereof, which were filed on June 10, 2024 under Dkt. No. 27 in the action captioned as *Atlas Data Privacy Corporation, et al. v. Lightbox Parent, L.P., et al.*, 24-04105 (the "Consolidated Motion to Dismiss").

For the reasons set forth in the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court grant the motion and dismiss Plaintiffs' Complaint in this matter with prejudice. Defendant further respectfully requests that all other deadlines in this matter be stayed until a decision on the Consolidated Motion to Dismiss, and that consistent with the Court's May 8, 2024 Order in *Atlas Data Privacy Corporation, et al. v. Lightbox Parent, L.P., et al.*, 24-04105 and the related cases, Defendant's joinder in this motion not be deemed a waiver of any other grounds for dismissal of the Complaint or other defenses it may have. Defendant reserves all rights to raise any other arguments or other defenses that could have been made in a motion to dismiss at a later date.

Finally, Defendant will meet and confer with Plaintiffs in the light of the Court's November 21, 2024 Remand Order and will provide a further update in the event that Plaintiffs plan to seek remand in this matter.

Sincerely,

/s/ David A. Luttinger, Jr.
David A. Luttinger, Jr.